

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

THE NAVAJO NATION,

Plaintiff,

v.

No. 1:25-cv-00055-JMC-GBW

THE UNITED STATES OF AMERICA,  
Debra Ann HAALAND, in her official  
capacity as Secretary of the Interior,  
U.S. DEPARTMENT OF THE INTERIOR;  
U.S. BUREAU OF LAND MANAGEMENT,

Federal Defendants,

and

PUEBLO OF ACOMA and PUEBLO OF  
LAGUNA,

Defendant-Intervenors.

**JOINT MOTION OF PLAINTIFF AND FEDERAL DEFENDANTS  
TO EXTEND STAY OF PROCEEDINGS FOR SIXTY (60) DAYS**

COME NOW Plaintiff and the Federal Defendants (“Parties”), by and through their respective counsel of record, and, pursuant to D.N.M.LR-Civ. 7.1(a), hereby jointly move to extend the stay of the proceedings in this matter for an additional sixty (60) days after the entry of an order granting the extension of the stay in this matter. In support of this Motion, the Parties state:

1. This case involves a challenge to Public Land Order No. (“PLO”) 7923 withdrawing 336,404 acres of land from new oil and gas leasing within a 10-mile buffer zone around Chaco Canyon.
2. The Court entered an Order on July 2, 2025, staying this litigation for ninety (90)

days from the date of the Order's entry. Dkt. No. 46.

3. The stay is set to expire on September 30, 2025.

4. Federal Defendants continue to review the potential for revoking or changing PLO 7923 in a manner that may satisfy or moot Plaintiff's claims.

5. Given these developments, the Parties have agreed that the Court should extend the stay of these proceedings for an additional sixty (60) days pending the agency's changes or revocation of PLO 7923. The stay will serve the interest of judicial efficiency and may obviate the need for further litigation.

6. Intervenors have been contacted through counsel regarding their position on the Motion and have not provided a position.

7. In accordance with the requirements of D.N.M.LR-Civ. 7.2, a proposed order granting the relief requested herein and approved by Plaintiff and Federal Defendants will be submitted to the Court for consideration.

WHEREFORE, the Parties respectfully request that this Court grant the Parties' Motion and extend the stay in this matter for sixty (60) days from the date of entry of the order granting this request.

Dated: September 29, 2025.

Respectfully submitted,

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By /s/ Eric R. Burris

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*Counsel for Federal Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 29, 2025, a true and correct copy of foregoing MOTION OF PLAINTIFF TO STAY PROCEEDINGS FOR SIXTY (60) DAYS was filed electronically pursuant to CM/ECF procedure for the United States District Court for the District of New Mexico, which caused the parties to be served via electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Eric R. Burris

Eric R. Burris